

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PRISONERS LEGAL ADVOCACY)	
NETWORK,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 23-1397-MN
)	
THE HONORABLE JOHN CARNEY, in his)	
official capacity as Governor of the State of)	
Delaware, THE HONORABLE ANTHONY)	
J. ALBENCE, in his official capacity as State)	
Election Commissioner of the Delaware)	
Department of Elections, and, THE)	
HONORABLE TERRA TAYLOR, in her)	
official capacity as Acting Commissioner of)	
the Delaware Department of Correction,)	
)	
Defendants.)	

**PLAINTIFF’S MOTION FOR EARLY PRELIMINARY INJUNCTION HEARING
DATE, PRELIMINARY INJUNCTION, AND TEMPORARY RESTRAINING ORDER**

Plaintiff Prisoners Legal Advocacy Network (“Plaintiff”) respectfully moves this Court to enter an early preliminary injunction hearing date, a preliminary injunction, and a temporary restraining order under 35 U.S.C. § 283 and Fed. R. Civ. P. 65(a) to ensure that the fundamental right to vote is restored to eligible incarcerated voters. The grounds for this motion are set forth in Plaintiff’s Opening Brief, submitted herewith.

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Dated: December 15, 2023

/s/ Emily S. DiBenedetto

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RULE 7.1.1 STATEMENT

Pursuant to Rule 7.1.1 of the Local Rules of the United States District Court for the District of Delaware, counsel for Prisoners Legal Advocacy Network (“Plaintiff”) hereby certify that a reasonable effort was made to reach agreement with the Honorable John Carney, the Honorable J. Albence, and the Honorable Terra Taylor (collectively, “Defendants”), regarding Plaintiff’s Motion for Early Preliminary Injunction Hearing, Preliminary Injunction, and Temporary Restraining Order on a meet and confer on November 29, 2023. The parties were unable to reach agreement.

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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2023, this document was served on the persons listed below in the manner indicated:

BY HAND DELIVERY

The Honorable Anthony J. Albence
State of Delaware - Department of Elections
905 S. Governors Avenue, Suite 170
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The Honorable Terra Taylor
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The Honorable John Carney
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